

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEANINE P. COHEN, :

Plaintiff, :

- against - :

**DECLARATION OF
JIMMY M. SANTOS**

WESTLAKE FLOORING SERVICES, INC., WEST- :
LAKE SERVICES, LLC d/b/a WESTLAKE FINANCIAL :
SERVICES, WESTLAKE FLOORING COMPANY LLC, :
THE HANKEY GROUP, JONATHAN ZHAN, SVP OF :
Westlake Flooring Company, LLC, in his corporate and :
individual capacities, JENNIFER FIORE, Director of Sales :
& Field Operations at Westlake Flooring Company, LLC, in :
her corporate and individual capacities, MEGAN FELD- :
METH, Human Resources Director for Westlake Financial :
Services, in her individual and corporate capacities, and :
JOHN DOES 1 through 10, in their individual and corporate :
capacities, :

Civil Case No.

22-CV-07182 (VB)

Defendants. :

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JIMMY M. SANTOS, hereby declares under the pains and penalties of perjury:

1. I represent Plaintiff Ms. Jeanine P. Cohen in the above-referenced action.
2. I submit this declaration in opposition, in part, to defendants' motion to compel arbitration in this matter.
3. Attached hereto as exhibit A is a true and accurate copy of Plaintiff's Complaint with annexed exhibits.
4. Attached hereto as exhibit B is a true and accurate copy of the Arbitration Agreement at issue.
5. Attached hereto as exhibit C is a true and accurate copy of the parties stipulation dated February 8, 2023.

Based on the foregoing, the attached exhibits, and Plaintiff's Memorandum of Law In Opposition, In Part, to the Motion, and on behalf of the Plaintiff, I ask that the Court sever the two provisions from the Arbitration Agreement as set forth on Plaintiff's Memo.

Dated: February 10, 2023
Cornwall, New York

/s/ Jimmy M. Santos
Jimmy M. Santos, Esq.